

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:
UNITED STATES OF AMERICA	:
	: <u>STIPULATION AND ORDER</u>
-v.-	:
	: S2 20 Cr. 110 (LJL)
LAWRENCE RAY,	:
	:
Defendant.	:
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	:
INGRID RAY and CARL RAY	:
	:
Third-Party Petitioners.	:
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WHEREAS, on or about January 31, 2023, the Court entered a Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the “Preliminary Order of Forfeiture”)(D.E. 616) imposing a forfeiture money judgment against LAWRENCE RAY (the “Defendant”) in the amount of \$2,444,349 in United States currency (the “Money Judgment”) and forfeiting, *inter alia*, all right, title and interest of the Defendant in the following property:

- a. The real property commonly described as 4 Scarborough Place, Pinehurst, North Carolina, 28374, more particularly described as Lot 300, Unit 17, Add 4, Phase 2, of the property of Pinehurst Incorporated, as shown on the Plat thereof, recorded in the office of the Register of Deeds of Moore County North Carolina, in Plat Cabinet 3, Slide 404;

(the “Subject Property”);

WHEREAS, on or about February 1, 2023, the Government filed a lis pendens against the Subject Property with the North Carolina, Moore County Clerk's Office (the "Lis Pendens");

WHEREAS, the Preliminary Order of Forfeiture directed the United States to publish, for at least thirty (30) consecutive days, notice of the Preliminary Order of Forfeiture, notice of the United States' intent to dispose of the Subject Property, and the requirement that any person asserting a legal interest in the Subject Property must file a petition with the Court in accordance with the requirements of Title 21, United States Code, Sections 853(n)(2) and (3). The Preliminary Order of Forfeiture further stated that the United States could, to the extent practicable, provide direct written notice to any person known to have an alleged interest in the Subject Property and as a substitute for published notice as to those persons so notified;

WHEREAS, the provisions of Title 21, United State Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, require publication of a notice of forfeiture and of the Government's intent to dispose of the Subject Property before the United States can have clear title to the Subject Property;

WHEREAS, on or about April 22, 2023, notice of the Preliminary Order of Forfeiture was sent by certified mail, return receipt requested, to, *inter alia*, Ingrid Ray;

WHEREAS, on or about May 18, 2023, Ingrid Ray and Carl Ray (the "Petitioners") filed an Amended Petition asserting interests in the Subject Property;

WHEREAS, the Government and the Petitioners have agreed to settle this matter without further litigation; and

WHEREAS, the Government and the Petitioners understand and agree that the payment by the Petitioners to settle this matter as to them does not constitute an admission of liability or violation of any applicable law, or any rule or regulation, as to all of which the Petitioners expressly deny any such liability or violation;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys, Danielle Sassoon and Lindsey Keenan, of counsel, the Petitioners and their counsel Stephen Dratch, Esq., that:

1. Within thirty (30) days of the entry of this Stipulation and Order, the Petitioners shall transfer \$10,000 in United States currency to the Government in a manner to be provided by the Government to counsel for the Petitioners (the “Payment”) which shall resolve the Government’s interest in the Subject Property.

2. Upon receipt of the Payment, the Government shall accept the Payment in lieu of forfeiting the Subject Property and will not seek the entry of a Final Order of Forfeiture with respect to the Subject Property.

3. The Government shall apply the Payment towards the satisfaction of the outstanding Money Judgment.

4. Upon receipt of the Payment, the Government shall cancel the Lis Pendens against the Subject Property.

5. The United States Marshals Service is authorized to deposit the Payment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

6. The terms of this Stipulation and Order shall be subject to approval by the Court.

7. The Government and Petitioners hereby agree to waive all rights to appeal or otherwise challenge or contest the validity of this Stipulation and Order.

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8. Each party shall bear its own costs and fees, including attorney's fees.

9. This Court will have exclusive jurisdiction over the interpretation and enforcement of this Stipulation and Order.

STIPULATED TO:

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York  
United States of America

By:



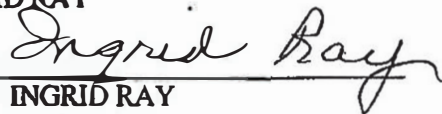
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(212) 637-1115/1565

July 28, 2023

Date

INGRID RAY

By:



INGRID RAY  
Petitioner

7/27/23  
Date

CARL RAY

By:



CARL RAY  
Petitioner

7/27/23  
Date

By:



Stephen Dratch, ESQ.  
Attorney for the Petitioners

7/28/23  
Date

SO ORDERED:



HONORABLE LEWIS J. LIMAN  
UNITED STATES DISTRICT JUDGE

7/28/2023  
Date